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From: ncrlog@mchsi.com
Sent: Tuesday, October 05, 2004 3:40 PM
To: FarmBillRules
Subject: Conservation Security Program

The National Catholic Rural Life Conference is a faith-based membership organization based in Des Moines, Iowa. We have actively engaged in agricultural, rural community and environmental issues since 1923. Our organization strongly urged members of Congress to include the Conservation Security Program in the 2002 Farm Bill, and we have continued to advocate for full funding of this innovative and crucial program for working farmlands and the continuing conservation of our nation's soil and water resources.

Unfortunately, we believe that the implementation of the Conservation Security Program as currently carried out by USDA under the Interim Final Rule is not what Congress passed into law under the 2002 Farm Bill. We are concerned that the USDA has distorted this innovative conservation program: you have made access to the program highly restricted and sign-up rules are overly burdensome. It appears to us that the USDA's Interim Final Rule fails to adequately reward proven conservation practices being used by farmers that enhance soil and water quality, like resource conserving crop rotations, rotational grazing, and organic farming. We would like to see the final rule reflect the fact that the CSP is a nationwide, open access and fully funded program, as passed by Congress and enacted into law in 2002.

In order to make the CSP a nationwide program, without geographic or other restrictions, we urge USDA to modify the final Program rule by removing the restrictions limiting enrollment to selected watersheds, certain classes of farmers and ranchers, and to a limited set of resource concerns. The CSP should be a nationwide program available to all types of producers in all regions of the country with all types of conservation objectives, as provided for in the 2002 Farm Bill.

As a second comment, we agree with those in sustainable agriculture who argue that CSP enhancement payments should be provided to farmers and ranchers who establish and maintain complex management systems. We urge USDA to provide a more comprehensive package of enhancement payments, including the following:

- For cropland, the CSP rule should include enhancement payments for complex Resource Conserving Crop rotations with a diversity index for enhanced payments.
- Enhancement payments should also be available for rotational grazing systems, conservation buffers, conservation and regeneration of plant and animal germplasm, environmentally sound management of invasive species, agroforestry practices, native prairie restoration, and pollinator protection and enhancement.
- Continue the enhancement payments for energy conservation provided in the Interim Final Rule.
- Retain the enhancement payments for on-farm/ranch research and demonstration activities and for on-farm/ranch assessment and evaluation activities provided in the Interim Final Rule and ensure that these enhancement payments are provided for in every state and sign-up.

As our final comment, we believe that the USDA should not require farmers and ranchers to meet specific quality criteria for soil and water quality in order to be eligible to apply for the Program. Instead, the USDA should more reasonably require that farmers and ranchers meet high soil and water quality criteria within a reasonable time after participating in the CSP. This rule change will still retain high environmental standards as CSP contract goals.

Thank you for considering these comments.

Robert Gronski, policy coordinator
National Catholic Rural Life Conference

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